

RBS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

AP 350

MARLYN PHILLIPS,
Plaintiff,

CASE NO.

11 3376

vs.

TRANSUNION, LLC; JOHN DOES 1-10
and X, Y, Z CORPORATIONS;
Defendants.

TRANS UNION LLC'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union LLC ("Trans Union") hereby removes the subject action from the Court Of Common Pleas of Bucks County, Pennsylvania, to the United States District Court for the Eastern District of Pennsylvania, on the following grounds:

1. Plaintiff Marlyn Phillips served Trans Union on or about May 6, 2011, with a Notice To Defend and Complaint filed in the Court Of Common Pleas of Bucks County, Pennsylvania. Copies of the Notice To Defend and Complaint are attached hereto as Exhibit A and Exhibit B. No other process, pleadings or orders have been served on Trans Union.
2. Plaintiff alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (the "FCRA"). See Complaint ¶1.
3. Pursuant to 15 U.S.C. §1681p and 28 U.S.C. §1331, this Court has original jurisdiction over FCRA claims without regard to the amount in controversy.
4. Pursuant to 28 U.S.C. § 1441, *et seq.*, this action may be removed from the Court of Common Pleas of Bucks County, Pennsylvania, to the United States District Court for the Eastern District of Pennsylvania.

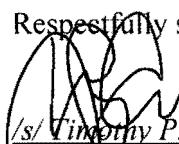
FILED
MAY 25 2011
MICHAEL E. KUNZ, Clerk
Dep. Clerk

5. Removal is timely because 30 days has not elapsed since Trans Union was served with the Notice to Defend and Complaint. No other Defendant has been named or served in this action.

WHEREFORE, Defendant Trans Union LLC removes the subject action from the Court of Common Pleas, Bucks County, Pennsylvania to the United States District Court for the Eastern District of Pennsylvania.

DATED: May 24, 2011

Respectfully submitted,


/s/ Timothy P. Creech

Timothy P. Creech, Esq.
Kogan Trichon & Wertheimer, P.C.
1818 Market Street, 30th Floor
Philadelphia, PA 19103-3699
(215) 575-7618; Fax: (215) 575-7688
E-Mail: tcreech@ktwlaw.com

Counsel for Trans Union, LLC

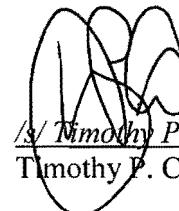
CERTIFICATE OF SERVICE

Timothy P. Creech, Esq., certifies that he caused a true and correct copy of the foregoing Trans Union LLC's Notice of Removal to be sent on this date via U.S. Mail, postage prepaid, to the following

Vicki Piontek, Esq.
951 Allentown Road
Lansdale, PA 19446

Counsel for Plaintiff

FILED
MAY 25 2011
MICHAEL E. KUNZ, Clerk
Dep. Clerk


/s/ Timothy P. Creech
Timothy P. Creech, Esq.

DATED: May 24, 2011

EXHIBIT A

Plaintiff's Notice To Defend to Trans Union

IN THE COURT OF COMMON PLEASE OF
BUCKS COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

Marlyn Phillips :
854 Martha Lane :
Warminster, PA 18974 :
Plaintiff :
Vs. :
Transunion, LLC : 2011-03214
555 W. Adams Street :
Chicago, IL 60661 :
and :
John Does 1-10 : Jury Trial Demanded
and :
X,Y, Z Corporations :
Defendant :

NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice to you for any money claimed in the Complaint or for any other claim or relief requested by Plaintiff(s). You may lose money or property or other rights important to you.

See Next Page -----→→→→→→

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU
DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR
TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU
CAN GET LEGAL HELP:

Legal Aid of Southeastern Pennsylvania for Bucks County
1290 Veterans Highway, Box 809, Bristol, PA 19007
215-781-1111

Bucks County Legal Aid Society
100 Union St, Doylestown, PA 18901
(215) 340-1818

Bucks County Bar Association
135 East State Street, PO Box 300, Doylestown, PA 18901
215-348-9413

EXHIBIT B

Plaintiff's Complaint

IN THE COURT OF COMMON PLEASE OF
BUCKS COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

Marlyn Phillips	:	
854 Martha Lane	:	
Warminster, PA 18974	:	
Plaintiff	:	
Vs.	:	
Transunion, LLC	:	2011-03214
555 W. Adams Street	:	
Chicago, IL 60661	:	
and	:	
John Does 1-10	:	Jury Trial Demanded
and	:	
X,Y, Z Corporations	:	
Defendant	:	

COMPLAINT

1. This is an action brought by a consumer for violation of alleged violations of the Fair Credit Reporting Act (FCRA), 15 USC 1681 et. Seq..
2. Plaintiff is Marlyn Phillips, an adult individual, residing at 854 Martha Lane, Warminster, PA 18974.
3. Defendants is Transunion, LLC, with a place of business located at 555 W. Adams Street, Chicago, IL 60661.

JURISDICTION AND VENUE

4. Jurisdiction and venue are proper because a substantial portion of the transactions, occurrences or omissions took place in this jurisdiction.
5. Jurisdiction and venue are proper because Defendant regularly transacts business in this jurisdiction and avails itself of the market place in this jurisdiction.
6. Jurisdiction and venue are proper in this jurisdiction because witnesses may be located in this jurisdiction.
7. Jurisdiction and venue are proper in this jurisdiction because the Plaintiff whose credit report was allegedly affected by Defendant(s)' alleged unlawful behavior resides in this jurisdiction.

**COUNT ONE: VIOLATION OF THE FAIR CREDIT REPORTING ACT,
15 USC 1681 et. seq.**

8. The previous paragraphs of this complaint are incorporated by reference and made a part hereof.
9. At all times pertinent hereto Plaintiff was a "consumer," as defined by 15 U.S.C. § 1681a(c).
10. At all times pertinent hereto, Defendant was a "person" and "consumer reporting agencies" as those terms are defined by 15 U.S.C. § 1681a(b) and (f).
11. At all times pertinent hereto, the credit reports mentioned in this complaint were "consumer reports" as that term is defined by 15 U.S.C. § 1681a(d)
12. Defendant is an entity who, regularly and in the course of business, furnishes information to one or more credit reporting agencies about Defendants(s) transactions or experiences with any consumer and Defendant is a "furnisher," as codified at 15 U.S.C. § 1681s-2.

13. Plaintiff disputed the alleged account(s) in writing with Defendant(s). See Attached exhibits.
14. Defendant(s) received Plaintiff's disputes concerning the alleged account(s). See attached exhibits.
15. Defendant purported to have investigated the disputed account(s), and verified the disputed information concerning such account(s). See attached exhibits.
16. Plaintiff requested that Defendant conduct a reinvestigation pursuant to 15 USC 1681 i. See attached exhibits.
17. Defendant did conduct one or more reinvestigations pursuant to 15 USC 1681 i, at which time Defendant(s) purportedly verified such accounts. See attached exhibits.
18. Pursuant to 15 USC 1681 i, et. seq. Defendant had a duty to inform Plaintiff upon Plaintiffs written request as to what Defendant(s) method of verification was when Defendant(s) conducted such reinvestigation(s).

19. Plaintiff sent Defendant(s) written requests asking Defendant(s) what method of verification that Defendant(s) used to conduct the reinvestigation. See attached exhibits.
20. Defendant refused to inform Plaintiff what Defendant(s) method of verification was following Plaintiff's written request to Defendant(s) to do so.
21. Defendant(s) breached its / their duty under 15 USC 1681 i, et. seq. to inform Plaintiff as to what Defendant(s) method of verification was when Defendant(s) conducted such reinvestigation(s).

LIABILITY

22. The previous paragraphs of this complaint are incorporated by reference and made a part hereof .
23. At all times various employees and / or agents of Defendant were acting as agents of Defendant, and therefore Defendant is liable to for the acts committed by its agents and / or employees under the doctrine of respondeat superior.
24. At all times various employees and / or agents of Defendant were acting jointly and in concert with Defendant, and Defendant is liable for the acts of such employees and / or agents under the theory of joint and several liability because Defendant and its agents were engaged in a common business venture and were acting jointly and in concert.

DAMAGES

25. The preceding paragraphs are incorporated by reference and made a part hereof.
26. Plaintiff's actual damages are \$1.00 more or less, including but not limited to postage, phone calls, fax, gas, mileage, etc.
27. \$1,000.00 statutory damages under 15 USC 1681 et. seq.
28. Plaintiff suffered some distress and anger as a result of his rights being violated by Plaintiff and the rights of other consumers.
29. The value of Plaintiff's emotional distress shall be proven at trial.
30. Plaintiff believes and avers that for purposes of a default judgment, Plaintiff's distress has a Dollar value of no less than \$5,000.00.
31. Plaintiff believes and avers that the acts committed by Defendant are willful, wanton intentional, or reckless at best. Plaintiff believes and avers that Defendant's acts are systemic. Therefore, punitive damages are warranted.
32. Plaintiff believes and avers that punitive damages should be awarded to Plaintiff in the amount of no less than \$20,000.

33. Attorney fees of \$3,237.50 at a rate of \$350.00 per hour, described below.

a. Consultation with Client and drafting dispute letters and letters of inquiry	4
b. Drafting, review and editing of complaint	2
c. Travel, document processing and filing	1
d. Service of Process	.25
e. Follow up correspondence with Defense	2
<hr/>	
Total = 9.25	\$3,237.50

34. Plaintiff's attorney fees continue to accrue as the case moves forward.

INJUNCTIVE RELIEF

35. Plaintiff seeks an order from this Honorable Court Directing Defendant(s) to provide written description of the method of verification that was used by Defendant(s) to conduct the reinvestigation on Plaintiff's account referenced in the attached exhibits.

OTHER RELIEF

36. Plaintiff requests such other relief as this court may deem just and proper.

Wherefore, Plaintiff demands judgment against Defendant(s) in the amount of \$29,238.50 (actual damages, statutory damages, attorney fees). Plaintiff also seeks punitive damages. Plaintiff also seeks such other relief as this Court deems fair and just.

Vicki Piontek
Vicki Piontek, Esquire
Attorney for Plaintiff
951 Allentown Road
Lansdale, PA 19446
877-737-8617
Fax: 866-408-6735
palaw@justice.com

4/28/2011
Date

IN THE COURT OF COMMON PLEASE OF
BUCKS COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

Marlyn Phillips	:
854 Martha Lane	:
Warminster, PA 18974	:
Plaintiff	:
Vs.	:
Transunion, LLC	:
555 W. Adams Street	:
Chicago, IL 60661	:
and	:
John Does 1-10	Jury Trial Demanded
and	:
X,Y, Z Corporations	:
Defendant	:

VERIFICATION

I, Marlyn Phillips, verify that the statements contained in the complaint against TransUnion are true and correct to the best of my knowledge, understanding and belief.

Marlyn Phillips

Marlyn Phillips

4-27-2011

Date

EXHIBITS

Marlyn Philips
854 Martha Lane
Warminster, PA 18974
215-917-4418

**Experian Information Services
P.O. Box 2002
Allen, TX 75013**

**Trans Union Corporation
P.O. Box 1000,
Chester, PA 19022**

**Equifax Information Services
P.O. Box 740241
Atlanta, GA 30374**

RE: Marlin Philips SSN [REDACTED]
Account Number: 1602
CAVALRY PORTFOLIO SERVICES / BANK OF AMERICA

To Whom it May Concern:

I dispute the above referenced derogatory information on my credit report. The amount stated is excessive and inflated.

I have requested documentation of the charged from Cavalry Portfolio Services. Cavalry Portfolio Services has failed to provide sufficient proof of the alleged balance.

Cavalry Portfolio Services has failed to provide documentation that they are the real party in interest. They have failed to provide a copy of the original contract which justified the excessive charges. They have failed to provide a breakdown of the changes including principle, late fee and interest.

Sincerely,

Sincerely,
Marlyn D. Phillips 5-9-2010
Marlyn D. Phillips Date

*** 207035628-011 ***
 PO Box 2000
 Chester, PA 19022



05/18/2010 TransUnion.



P13XN900200066-I000261-009999228
 MARLYN D. PHILIPS
 854 MARTHA LN
 WARMINSTER, PA 18974

Our investigation of the dispute you recently submitted is now complete. The results are listed below. If an item you disputed is not in the list of results below, it was either not appearing in your credit file or it already reflected the corrected status at the time of investigation.

If our investigation has not resolved your dispute, you may add a 100-word statement to your report. If you provide a consumer statement that contains medical information related to service providers or medical procedures, then you expressly consent to TransUnion including this information in every credit report we issue about you. If you wish to obtain documentation or written verification concerning your accounts, please contact your creditors directly.

If there has been a change to your credit history resulting from our investigation, or if you add a consumer statement, you may request that TransUnion send an updated report to those who received your report within the last two years for employment purposes, or within the last one year for any other purpose.

If interested, you may also request a description of how the investigation was conducted along with the business name, address and telephone number of any company we may have contacted for information.

Thank you for helping ensure the accuracy of your credit information.

For frequently asked questions about your credit report, please visit <http://transunion.custhelp.com>.

Investigation Results

ITEM	DESCRIPTION	RESULTS
CAVALRY PORTFOLIO SVCS <i>Planned</i>	1602	NEW INFORMATION BELOW

File Number: 207035628
 Page: 1 of 1
 Date Issued: 05/18/2010 TransUnion.



Special Notes: If any item on your credit report begins with 'MED1', it includes medical information and the data following 'MED1' is not displayed to anyone but you except where permitted by law.

Account Information

The key to the right helps explain the payment history information contained in some of the accounts below. Not all accounts will contain payment history information, but some creditors report how you make payments each month in relation to your agreement with them.

N/A	<input checked="" type="checkbox"/> X	<input type="checkbox"/> OK	<input type="checkbox"/> 30	<input type="checkbox"/> 60	<input type="checkbox"/> 90	<input type="checkbox"/> 120
Not Applicable	Unknown	Current	30 days late	60 days late	90 days late	120 days late

Adverse Accounts

The following accounts contain information which some creditors may consider to be adverse. Adverse account information may generally be reported for 7 years from the date of the first delinquency, depending upon your state of residence. The adverse information in these accounts has been printed in brackets or is shaded for your convenience, to help you understand your report. They are not bracketed or shaded this way for creditors. (Note: The account # may be scrambled by the creditor for your protection.)

CAVALRY PORTFOLIO SVC 1602

7 SKYLINE DR 3RD FL
 HAWTHORNE, NY 10532
 (800) 501-0909

Balance: \$12,125
 Date Verified: 05/2010
 Original Amount: \$10,901
 Original Creditor: 08 BANK OF AMERICA
 Past Due: \$12,096

Pay Status: COLLECTION ACCOUNT
 Account Type: OPEN ACCOUNT
 Responsibility: INDIVIDUAL ACCOUNT

Loan Type: COLLECTION AGENCY/ATTORNEY
 Remarks: ACCT INFO DISPUTED BY CONSUMR
 Date placed for collection: 06/2008
 Estimated date that this item will be removed: 05/2013

- End of investigation results -

To view a free copy of your full, updated credit file, go to our website <http://disclosure.transunion.com>

Marlyn Philips
854 Martha Lane
Warminster, PA 18974
215-917-4418

Transunion
P.O. Box 2000
Chester, PA 19022

RE: Marlin Philips SSN [REDACTED]
Account Number: [REDACTED] 1602
CAVALRY PORTFOLIO SERVICES / BANK OF AMERICA

To Whom it May Concern:

Recently I disputed the above referenced account with your company in May of 2010. See Exhibit A.

Your company then wrote back to me in May of 2010 indicating that the alleged account had been verified. See Exhibit B.

Please describe the method of verification that was used to verify this particular account. What method of verification was used to verify the above referenced account after I disputed it?

Thank you.

Sincerely,

Marilyn D Phillips 7/26/2010
Marilyn D. Phillips Date

*** 207035628-014 ***
 PO Box 2000
 Chester, PA 19022



08/24/2010 TransUnion.



P17HSH00200085-I000337-000025467

|||||
 MARLYN D. PHILIPS
 854 MARTHA LN
 WARMINSTER, PA 18974

Our investigation of the dispute you recently submitted is now complete. The results are listed below. If an item you disputed is not in the list of results below, it was either not appearing in your credit file or it already reflected the corrected status at the time of investigation.

If our investigation has not resolved your dispute, you may add a 100-word statement to your report. If you provide a consumer statement that contains medical information related to service providers or medical procedures, then you expressly consent to TransUnion including this information in every credit report we issue about you. If you wish to obtain documentation or written verification concerning your accounts, please contact your creditors directly.

If there has been a change to your credit history resulting from our investigation, or if you add a consumer statement, you may request that TransUnion send an updated report to those who received your report within the last two years for employment purposes, or within the last one year for any other purpose.

If interested, you may also request a description of how the investigation was conducted along with the business name, address and telephone number of any company we may have contacted for information.

Thank you for helping ensure the accuracy of your credit information.

For frequently asked questions about your credit report, please visit <http://transunion.custhelp.com>.

Investigation Results

ITEM	DESCRIPTION	RESULTS
CHASE/BANK ONE CARD SERV	✓ Redacted	.5054 NEW INFORMATION BELOW
DISCOVER FINCL SVC LLC	✓ Redacted	.8954 NEW INFORMATION BELOW
CAVALRY PORTFOLIO SVCS	✓ Redacted 1802	NEW INFORMATION BELOW

File Number: 207035628
 Page: 1 of 1
 Date Issued: 08/24/2010 TransUnion.

Special Notes: If any item on your credit report begins with 'MED1', it includes medical information and the data following 'MED1' is not displayed to anyone but you except where permitted by law.

Account Information

The key to the right helps explain the payment history information contained in some of the accounts below. Not all accounts will contain payment history information, but some creditors report how you make payments each month in relation to your agreement with them.

N/A	X	OK	30	60	90	120
Not Applicable	Unknown	Current	30 days late	60 days late	90 days late	120 days late

Adverse Accounts

The following accounts contain information which some creditors may consider to be adverse. Adverse account information may generally be reported for 7 years from the date of the first delinquency, depending on your state of residence. The adverse information in these accounts has been printed in brackets or is shaded for your convenience, to help you understand your report. They are not bracketed or shaded this way for creditors. (Note: The account # may be scrambled by the creditor for your protection).

CAVALRY PORTFOLIO S RECD 1602

7 SKYLINE DR 3RD FL
 HAWTHORNE, NY 10532
 (800) 501-0909

Loan Type: COLLECTION AGENCY/ATTORNEY

Remarks: ACCT INFO DISPUTED BY CONSUMR

Date placed for collection: 06/2008

Estimated date that this item will be removed: 05/2013

Balance: \$12,263
 Date Verified: 08/2010
 Original Amount: \$10,901
 Original Creditor: 08 BANK OF AMERICA
 Past Due: \$12,263

Pay Status:)COLLECTION ACCOUNT:
 Account Type: OPEN ACCOUNT
 Responsibility: INDIVIDUAL ACCOUNT

Loan Type: [REDACTED]

Remarks: [REDACTED]

Estimated date that this item will be removed: [REDACTED]

Balance:
 Date Verified:
 High Balance:
 Credit Limit:

Pay Status:
 Account Type:
 Responsibility:
 Date Open:
 Date Closed:
 Date Paid:

Loan Type: [REDACTED]

Remarks: [REDACTED]

Estimated date that this item will be removed: [REDACTED]

Balance:
 Date Verified:
 High Balance:
 Credit Limit:
 Past Due:

Pay Status:
 Account Type:
 Responsibility:
 Date Open:
 Date Closed:

- End of investigation results -

To view a free copy of your full, updated credit file, go to our website <http://disclosure.transunion.com>

Marlyn Philips
854 Martha Lane
Warminster, PA 18974
215-917-4418

**Trans Union Corporation
P.O. Box 1000,
Chester, PA 19022**

RE: Marlin Philips SSN [REDACTED]
Account Number: 1602
CAVALRY PORTFOLIO SERVICES / BANK OF AMERICA
Alleged High Balance \$12, 263

To Whom it May Concern:

Recently I disputed the above referenced account with your company. The basis of my dispute was that the alleged high balance was excessive and inflated, and not supported by any existing contract. I never owed Cavalry Portfolio \$12,263. That amount was excessive and inflated with fees and interest that I did not legally owe.

Equifax has investigated the account, verified it, and then reinvestigated it on more than one occasion.

Please describe the method of verification that was used in your reinvestigation. What method of verification was used to investigate the above referenced account after I disputed it?

Thank you.

Sincerely,

Marilyn D. Phillips 01/13/2011
Marilyn D. Phillips Date

Marlyn Phillips
854 Martha Lane - Warminster, PA 18974

**Trans Union Corporation
P.O. Box 1000,
Chester, PA 19022**

By Certified U.S. Mail

DISPUTE AND REQUEST FOR METHOD OF VERIFICATION

RE: Marlyn Phillips SSN [REDACTED]
CAVALRY PORTFOLIO SERVICES / BANK OF AMERICA
Account Number 1602 Alleged High Balance \$12,263

To Whom it May Concern:

Recently I disputed the above referenced account with your company. The basis of my dispute was that the alleged high balance was excessive and inflated, and not supported by any existing contract. I never owed Cavalry Portfolio \$12,263. That amount was excessive and inflated with fees and interest that I did not legally owe.

Cavalry Portfolio has contradictory records. They are reporting \$12,263 to your company (Exhibit A), and only \$10,901 to Equifax and Experian (Exhibits B and C).

I have written to Cavalry Portfolio in the past, and they have failed to produce a copy of the contract which justifies the excessive balance reported to Transunion, or to any other credit bureau.

Tranunion has investigated the account, verified it, and then reinvestigated it on more than one occasion. "Please describe the specific method of verification that was used in your reinvestigation in this particular case. What method of verification was used to investigate the above referenced account after I disputed it?

I have asked this question before, but your company had failed to provide me with the answer I asked. Instead of answering my question, you sent me a generalized description of the how Transunion usually conducts investigation. Again, please provide me with a description of the specific means used by your company to verify the alleged balance for this bill.

Thank you.

Sincerely,

Sincerely,

Marilyn D. Phillips
Date: 3/01/2011

*** 207035628-025 ***
 PO Box 2000
 Chester, PA 19022



02/05/2011 TransUnion.



P1E6AC00200021-I000081-030686074
 MARLYN D. PHILIPS
 854 MARTHA LN
 WARMINSTER, PA 18974

Our investigation of the dispute you recently submitted is now complete. The results are listed below. If an item you disputed is not in the list of results below, it was either not appearing in your credit file or it already reflected the corrected status at the time of investigation.

If our investigation has not resolved your dispute, you may add a 100-word statement to your report. If you provide a consumer statement that contains medical information related to service providers or medical procedures, then you expressly consent to TransUnion including this information in every credit report we issue about you. If you wish to obtain documentation or written verification concerning your accounts, please contact your creditors directly.

If there has been a change to your credit history resulting from our investigation, or if you add a consumer statement, you may request that TransUnion send an updated report to those who received your report within the last two years for employment purposes, or within the last one year for any other purpose.

If interested, you may also request a description of how the investigation was conducted along with the business name, address and telephone number of any company we may have contacted for information.

Thank you for helping ensure the accuracy of your credit information.

**For frequently asked questions about your credit report, please visit
<http://transunion.com/consumerfaqs>.**

Investigation Results

ITEM	DESCRIPTION	RESULTS
CAVALRY PORTFOLIO SVCS	Rebuked 1602	NEW INFORMATION BELOW

*** 207035628-028 ***
PO Box 2000
Chester, PA 19022



File Number: 207035628
Page: 1 of 1
Date Issued: 2/14/2011



P1EJQ400200379-I000757-032663286
|||||
MARLYN D PHILIPS
854 MARTHA LN
WARMINSTER, PA 18974

Thank you for contacting TransUnion. Our goal is to maintain complete and accurate information on consumer credit reports. We have provided the information below in response to your request.

Re: Dispute Status

Our records show that your creditor(s) previously verified as accurate the items that are listed below. Therefore, under the Fair Credit Reporting Act, we consider this dispute frivolous and we will not reinvestigate the item(s) unless you can provide court papers or a recent, authentic letter from the creditor(s) that explains what information should be updated.

If you disagree with the results of your dispute, you may add a consumer statement of 100 words or less to your credit report or you may contact the creditor directly. If you provide a consumer statement that contains medical information, then you expressly consent to TransUnion including this information in every credit report we issue about you.

The names and addresses are listed below:

CAVALRY PORTFOLIO SVCS
ACCT # 13311602
500 SUMMIT LAKE DR
STE 4A
VALHALLA, NY 10595
(800) 501-0909

If you have any additional questions or concerns, please contact TransUnion at the address shown below, or visit us on the web at www.transunion.com for general information. When contacting our office, please provide your current file number 207035628.

P.O. BOX 2000
CHESTER, PA 19022-2000

Marlyn Phillips
854 Martha Lane - Warminster, PA 18974

Trans Union Corporation
P.O. Box 1000,
Chester, PA 19022

By Certified U.S. Mail

REQUEST FOR METHOD OF VERIFICATION

RE: Marlyn Phillips SSN [REDACTED]
CAVALRY PORTFOLIO SERVICES / BANK OF AMERICA
Account Number 1602 Alleged High Balance \$12,263

To Whom it May Concern:

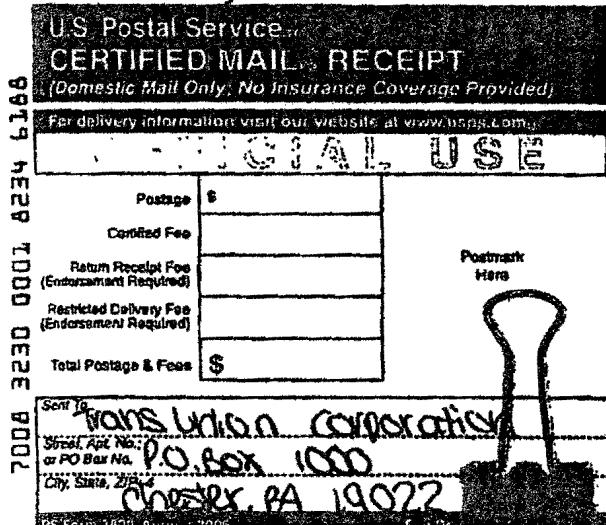
Recently I disputed the above referenced account with your company on more than one occasion.

Your company investigated the matter, and then reinvestigated in more than once. Because a reinvestigation occurred, I am entitled to know the method of verification that your company used to allegedly verify the alleged account.

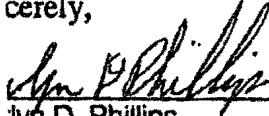
Please describe the specific method of verification that was used in your reinvestigation in this particular case. What method of verification was used to investigate the above referenced account after I disputed it?

I have asked this question before, but your company had failed to provide me with the answer I asked. Instead of answering my question, you sent me a generalized description of the how Transunion usually conducts in investigation. Again, please provide me with a description of the specific means used by your company to verify the alleged balance for this bill.

Thank you.



cerely,


Lyn D. Phillips

2/24/2011
Date

*** 207035628-030 ***
 PO Box 2000
 Chester, PA 19022



03/05/2011 TransUnion.



P1FEBB00200021-1000081-035769469



MARLYN D. PHILIPS
 854 MARTHA LN
 WARMINSTER, PA 18974

Our investigation of the dispute you recently submitted is now complete. The results are listed below. If an item you disputed is not in the list of results below, it was either not appearing in your credit file or it already reflected the corrected status at the time of investigation.

If our investigation has not resolved your dispute, you may add a 100-word statement to your report. If you provide a consumer statement that contains medical information related to service providers or medical procedures, then you expressly consent to TransUnion including this information in every credit report we issue about you. If you wish to obtain documentation or written verification concerning your accounts, please contact your creditors directly.

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If interested, you may also request a description of how the investigation was conducted along with the business name, address and telephone number of any company we may have contacted for information.

Thank you for helping ensure the accuracy of your credit information.

**For frequently asked questions about your credit report, please visit
<http://transunion.com/consumerfaqs>.**

Investigation Results

ITEM	DESCRIPTION	RESULTS
ASSET ACCEPTANCE LLC	# 3858****	DELETED
CAVALRY PORTFOLIO SVCS	# 1331****	PREVIOUSLY VERIFIED

Piontek Law Office
951 Allentown Road
Lansdale, PA 19446

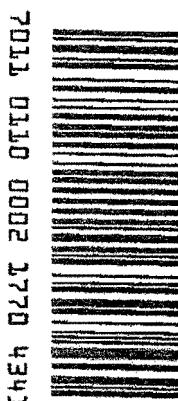


CERTIFIED MAIL



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TRANS UNION, LLC

555 WACKERS STREET

CHICAGO, IL 60661

RECEIVED

MAY - 6 2011

CORPORATE
MAILROOM